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Memorandum

TO:

Barbara O'Grady, CDPHE

FROM:

Victor Ketellapper, USEPA

SUBJECT:

March 2004 Monthly Progress Report on the Remedial Action at the Vasquez

Boulevard/Interstate 70 Superfund Site, Operable Unit 01

This monthly progress report was prepared and submitted to the Colorado Department of Public Health and the Environment as required in the Superfund State Contract for Remedial Action Implementation, Vasquez Boulevard/Interstate 70, Operable Unit 01. The report describes the work completed during the preceding month for each activity, a summary of expenditures, a summary of change orders and claims, and a description of whether the project is on schedule and within budget, and an estimate of variances expected at the project completion.

Activities Completed During the Month

The following is a summary of the activities completed for each component of the remedy during the month. A summary of the funds obligated and the actual expenditures that occur during the month for each component of the remedy is found in the attached table.

Soil Removal and Replacement

Status or Soil Removal Cleanups

Properties Completed In 2003	133
Properties Completed in 2004 through March 2004	33
Total Properties Completed	166
Estimated Cleanups Required	853

- Cleanups conducted prior to signing the State Superfund Contract (SSC) were completed as part of the Non-Time Critical Removal Action.
- Issued an Interagency Agreement (IAG) with the Army Corps of Engineers to conduct soil removal portion of the remedy. \$1.935 million was obligated towards this IAG.
- Issued a request for proposal for community relations support of the Remedial Action. This includes revising the community relations plan. A purchase request of \$65,000 was obligated towards this contract.

Community Health Program

• Continued efforts to develop the Community Health Program. The City of Denver, the CDPHE, Community Groups and EPA are working together to develop a strategy to implement the community health program.

Soil Sampling

This portion of the remedial action has not begun.

Change Orders and Claims

None

Project Status

The remedial action at Operable Unit 01 of the Vasquez Blvd/Interstate 70 Superfund Site is planned to be completed on September 30, 2006. The budget with contingency is \$26 million. The project is currently on schedule and within budget.

Variances Expected

Negotiations with ASARCO are currently underway to allow for the permanent placement of the excavated residential soils on the ASARCO Globe Plant. If these negotiations fail, the soils will be disposed at a municipal landfill. Current cost estimated indicate that disposal of the excavated soils at the municipal landfill will cost an additional \$1.5 to \$2.0 million. It is not expected that disposal at a municipal landfill disposal will cause the project budget to be exceeded.

Background

The VB/I70 Site covers an area of approximately four and a half square miles in north-central Denver, Colorado. For the purpose of investigation and remediation, the site has been divided into three operable units. OU1 is composed of a number of the City and County of Denver neighborhoods that are largely residential, including Swansea/Elyria, Clayton, Cole, portions of Globeville and a northern portion of Curtis Park. Approximately 4,000 residential properties are located within OU1.

The Record of Decision (ROD), signed on September 25, 2003, selected the remedy for OU-1. The remedial action selected for this project includes the following components:

Removal and replacement of soils on residential properties that the action level of lead or arsenic has been exceeded. The soil action levels selected in the ROD are 400 parts per million (ppm) and 70 ppm, respectively. The remedy also allows for the abatement of exterior lead based paint to prevent the recontamination of soils that have been remediated.

- 2. Conducting a Community Health Program during the duration of the soil cleanup activities.
- 3. Soil sampling of residential properties that have not been adequately evaluated for lead and arsenic.

Soil Removal and Replacement

Soil removal and replacement will occur at properties that have levels of lead and/or arsenic in the soil greater than the action level as described in the ROD. For properties which soil removal is conducted, all accessible soil will be removed to a depth of 12 inches. The excavation areas will be backfilled with clean soil, and yard features will be restored to the extent practicable, in consultation with the property owner. All excavated soils will be transported to an acceptable receiving facility.

Soil removal and replacement will include the following activities:

- 1. Access Agreements and Property Owner Authorization
- 2. Property Specific Design
- 3. Evaluation of Exterior Lead Based Paint
- 4. Supplemental Sampling of Garden Areas
- 5. Lead Based Paint Abatement if Needed to Protect the Soil Replacement Remedy
- 6. Soil Removal
- 7. Soil Transportation and Disposal
- 8. Backfill and Restoration of Excavated Areas
- 9. Post Construction Maintenance
- 10. Follow-Up Activities

A detailed description of each of these activities is found in the "Remedial Design Work Plan for Soil Sampling and Remediation Program" dated March 2003.

Community Health Program

The Community Health Program consists of community and individual health education, a biomonitoring program to measure urinary arsenic levels and blood lead levels in children, and a response programs that includes the necessary follow-up environmental sampling, home investigations, and referral to programs available to conduct response actions. The first element will address risks to area children from sources of lead. The second element will be designed to address children with soil pica behavior, to reduce their risks to arsenic in soil above 47 ppm. Participation in the program will be voluntary. The Community Health Program will be implemented on an ongoing basis until the residential soil removal portion of this remedial action has been completed.

The "Community Health Program Design Work Plan" dated March 2003 provides guidelines for implementing the Community Health Program. Specific actions conducted as part of the

Community Health Program will be tailored to each of the neighborhoods within the Site.

Soil Sampling

A program of on-going sampling will be implemented for lead and arsenic at all residential properties within the Site that have not already been adequately tested. This sampling program will continue through the completion of the soil removal portion of this remedy.

Item		Expenditures			SSC
	Funds	This	Previous	Total	Budget
	Obligated	Month			
Residential Property Cleanup					
Army Corps of Engineers IAG # DW-96-9539110-0	\$1,935,000	\$0	\$203	\$203	
Community Relations Plan	\$65,000	\$0	\$0	\$0	
Subtotal - Residential Property Cleanup	\$2,000,000	. \$0	\$203	\$203	\$21,500,000
Community Health Program					
City of Denver	1	\$0	\$0	\$0	
CDPHE - Environmental Epidemiology	1	\$0	\$0	\$0	
Subtotal - Community Health Program	\$0	\$0	\$0	\$0	\$1,500,000
Soil Sampling					
URS - START 2 Contract TDD 0305-0005A (1)	1	\$0	\$0	\$0	\$400,000
Subtotal - Soil Sampling		\$0	\$0	\$0	
Total Expenditures/Budget	\$2,000,000	\$0	\$203	\$203	\$23,400,000
Contingency					\$2,600,000
Total Budget					\$26,000,000

Notes:

^{1) \$50,000} of the funds in this TDD were obligated prior to the beginning of thie RA. The expenditures shown only reflect only the portion of the funds expended as part of the remedial action.